

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Alex Spiro (admitted *pro hac vice*)
2 alexspiro@quinnemanuel.com
51 Madison Avenue, 22nd Floor
3 New York, New York 10010
Telephone: (212) 849-7000

4 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Robert M. Schwartz (Bar No. 117166)
robertschwartz@quinnemanuel.com
6 Michael T. Lifrak (Bar No. 210846)
michaellifrak@quinnemanuel.com
7 Jeanine M. Zalduendo (Bar No. 243374)
jeaninezalduendo@quinnemanuel.com
8 865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
9 Telephone: (213) 443-3000

10 *Attorneys for Defendant Elon Musk*

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 VERNON UNSWORTH,
16 Plaintiff,
17 vs.
18 ELON MUSK,
19 Defendant.

Case No. 2:18-cv-08048

Judge: Hon. Stephen V. Wilson

**DEFENDANT ELON MUSK'S
PROPOSED VOIR DIRE
QUESTIONS**

Complaint Filed: September 17, 2018
Trial Date: December 3, 2019

Hearing Date: November 25, 2019
Time: 3:00 p.m.
Courtroom: 10A

1 Defendant Elon Musk respectfully submits the following voir dire questions
2 for the Court's consideration:

- 3 1. Do you hold a strong opinion, whether negative or positive, about Elon
4 Musk?
- 5 2. Some of the evidence of this case will contain swear words or harsh
6 language. Will the use of such words or language affect your ability to be
7 fair and impartial?
- 8 3. Do you hold a strong opinion, whether negative or positive, about
9 somebody who is a billionaire?
- 10 4. Do you have any personal ties to, or have you spent considerable time in,
11 Thailand, the United Kingdom, or South Africa?

12 Please include the following question as a follow-up to the Court's voir dire
13 regarding the criminal background of any potential juror:

- 14 5. Have you, or any close friend or family member, ever been accused of
15 wrongdoing or criminal conduct?

16 Please including the following question among the biographical information
17 requested from each potential juror:

- 18 6. From which source or sources do you get your news?

19
20 DATED: November 21, 2019

Respectfully submitted,

21 QUINN EMANUEL URQUHART &
22 SULLIVAN, LLP

23 By /s/ Alex Spiro

24 Alex Spiro (admitted *pro hac vice*)
25 Attorneys for Defendant Elon Musk
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